



BOFAS Privacy Statement

Introduction

Welcome to the privacy notice of The British Orthopaedic Foot & Ankle Society (BOFAS), a registered charity with registered number 326114.

BOFAS respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and when you register as a BOFAS member via the website. This privacy notice will also tell you about your privacy rights and how the law protects you.

The website operated by us at www.bofas.org.uk

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

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1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how BOFAS collects and processes your personal data through your use of our website, including any data you may provide through our website when

you register to become a BOFAS member, attend events, contact us via our contact page or apply for bursaries, fellowship funding and research grants.

The website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

BOFAS is the controller and responsible for your personal data (referred to as BOFAS, "we", "us" or "our" in this privacy notice).

We have appointed a data protection manager (DPM) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact the DPM using the details set out below.

Contact details

Our full details are:

Full name of legal entity: British Orthopaedic Foot & Ankle Society (BOFAS)

Name or title of DPM: Jo Millard

Email address: administrator@bofas.org.uk

Postal address: BOFAS, PO Box 209, Bristol BS20 1DL

Telephone number: 07847281130

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. We would, however, appreciate the chance

to deal with your concerns before you approach the ICO so please contact us at treasurer@bofas.org.uk in the first instance.

If you would like to contact the ICO, the details are as follows:

- Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Tel: 01625 545 745
- Email: international.team@ico.org.uk
- Website: www.ICO.org.uk

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 25 May 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name, title and date of birth.
- **Contact Data** includes home address, work address, email address and telephone number.
- **Financial Data** includes bank account details.
- **Transaction Data** includes details about payments to and from you and other details of services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Profile Data** includes your username and password, postgraduate qualifications and grades, references, feedback, survey responses.
- **Usage Data** includes information about how you use our website.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - complete the forms on our website contact page;
 - register to become a member of BOFAS via our website (and create an account);
 - apply for bursaries, fellowship funding and research grants.
- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, as we do not send direct marketing communications to you, nor do we process Special Categories of Personal Data.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at treasurer@bofas.org.uk if you

need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new member including sending emails relating to your account set up, status and account credentials.	(a) Identity (b) Contact (c) Profile	Performance of a contract with you
To process your membership registration: (a) Manage payments, fees and charges (b) Collect and recover money owed to us We may use External Third Parties for the processing of payment, fees and charges.	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy; (b) Asking you to leave a review or take a survey; (c) Contacting you by email or phone regarding your account; (d) sending you membership information and news; (e) inviting you to member events and training and other similar events; (d) sending you publications relevant to our members. We may use External Third Parties for the processing of data to assist in sending emails and other correspondence.	(a) Identity (b) Contact (c) Profile (d) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how members use our services)

<p>We assess your data and application for any bursary or grant, including suitability thereof.</p>	<p>(a) Identity (b) Contact (c) Profile</p>	<p>Where the grant etc is administered or granted by use, we will process this data on the basis of:</p> <p>(a) Necessary for our legitimate interests (we need to be able to assess applications for suitability).</p> <p>When applying for a bursary or grant which is made available by a third party via us, and we need to share your data with such third party, we will only do so on the basis of:</p> <p>(a) Consent - we will seek your consent before making your data available.</p>
<p>To enable you complete a survey or provide feedback.</p> <p>We may use External Third Parties for the processing of data to assist in sending emails and other correspondence.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (to study how members use our services, to develop them and grow our business)</p>
<p>To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).</p> <p>We may use External Third Parties for the hosting of data, applications, website and technical support of the same.</p>	<p>(a) Identity (b) Contact (c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant content to you.</p> <p>We may use External Third Parties for the processing of data to assist in sending emails and other correspondence.</p>	<p>(a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical</p>	<p>Necessary for our legitimate interests (to study how members use our services, to develop them, to grow our business and to inform our marketing strategy)</p>

To use data analytics to improve our website and services, member relationships and experiences and to ensure our website displays and operates properly on your devices.	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of members for our services, to keep our website updated and relevant, to develop our business)
To make suggestions and recommendations to you about services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our services and grow our business)

Marketing

We will get your express opt-in consent before we share your personal data with any company not related to BOFAS.

You will receive communications from us that are relevant to your membership with us, and, where you have not opted out of receiving that marketing. This may be courses or meetings of interest to you (based on your membership).

You can ask us or third parties to stop sending you these messages at any time by amending your preferences in your user account (via the website) and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time. Please note opt out will not apply to any emails or communications relating to your membership, renewal and maintenance thereof, and which are not marketing.

Cookies

Most websites you visit will use cookies to help customise your experience. Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about the cookies we use, please see [LINK TO YOUR COOKIE POLICY.]

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at treasurer@bofas.org.uk

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External third parties, such as Eazipay, European F&A Society (EFAS), Survey Monkey and Paypal. For the avoidance of doubt, we do not share your personal data with Find a Doctor. It may, however, obtain your personal data when it searches our members database.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. BOFAS uses SSL encryption to transfer information between your device and our servers. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your

consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Further information on these rights can be found on the ICO website.

If you wish to exercise any of the rights set out above, please contact our DPM, who's details can be found at the top of this notice.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by **contacting us** at treasurer@bofas.org.uk

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

- Service providers who provide IT, system administration and development services, including Survey Monkey.

- Payment providers of payment information, including Eazipay and Paypal.
- HM Revenue & Customs, regulators and other authorities based in the United Kingdom who require reporting of processing activities in certain circumstances.